

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
FOR THE EASTERN DIVISION**

**JANE ROE, individually and on
behalf of all others similarly
situated,**

Plaintiff,

V.

INTELLICORP RECORDS, INC.

Defendant.

CASE NO. 1:12CV2288

JUDGE JAMES S. GWIN

**MAGISTRATE JUDGE GREG
WHITE**

**JOINT MOTION TO CONTINUE
ALL DATES**

Plaintiff Jane Roe and Defendant Intellicorp Records, Inc. jointly move this Court to continue all dates in the above-captioned matter by 21 days. From April 30 - May 1, 2013, the parties engaged in a mediation before Niki Z. Schwartz, and since that time, they have continued to negotiate with Mr. Schwartz's assistance. The parties have scheduled an additional day of mediation on May 21, 2013. Mr. Schwartz and the parties believe that a brief 21-day extension of time will facilitate their discussions. Good cause therefore exists to grant this motion.

For purposes of clarity, the parties are requesting that the Court adopt the following amended case management schedule:

<u>Event</u>	<u>Current Deadline</u>	<u>New Deadline</u>
Deadline to file any objections to the qualifications of an expert under <i>Daubert</i>	June 14, 2013	July 5, 2013
Deadline for all discovery	June 17, 2013	July 8, 2013
Deadline to file any responses to objections to the qualifications of experts under <i>Daubert</i>	June 21, 2013	July 12, 2013
Final Pretrial Conference	July 10, 2013, at 12:00 p.m.	July 31, 2013
Trial (beginning of two-week standby period)	July 15, 2013	August 5, 2013

For the foregoing reasons, the parties request that the Court continue all dates in the above-captioned matter by 21 days.

Dated: May 14, 2013

Respectfully submitted,

/s/ Nance F. Becker

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CERTIFICATE OF SERVICE

I hereby certify that on May 14, 2013, a true and correct copy of the foregoing document was filed electronically. Notification of this filing will be sent to the parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Respectfully submitted,

/s/ David H. Wallace

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